

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

NATIONAL JOB CORPS ASSOCIATION, *et al.*,

Plaintiffs,

- against -

DEPARTMENT OF LABOR, *et al.*

Defendants.

No. 25 Civ. 04641 (ALC)

**DECLARATION OF ERIN LEIGH MCGEE**

I, Erin Leigh McGee, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the Acting Administrator of the Office of Job Corps (OJC), Employment and Training Administration (ETA), United States Department of Labor (DOL). In my capacity as Acting Administrator, I am responsible for providing executive management and oversight of the Job Corps program.

**Background on Job Corps**

2. Job Corps is a primarily residential career and education training program authorized under Subtitle C of Title I of the Workforce Innovation and Opportunity Act (WIOA), 29 U.S.C. § 3191 *et seq.*

3. The program assists eligible individuals ages 16 through 24 with completing their high school education and provides vocational training designed to help program graduates enter the workforce or an apprenticeship, go on to higher education, or join the military.

4. There are 123 Job Corps centers nationwide, with at least one Job Corps center in each of the 50 states, the District of Columbia, and Puerto Rico.

5. Ninety-nine centers are operated by private entities under contracts with DOL, while 24 are operated by the United States Department of Agriculture's Forest Service (known as Civilian Conservation Centers) under an interagency agreement with DOL. DOL's Office of the Senior Procurement Executive, Job Corps Acquisition Services, awards and administers all Job Corps center operations contracts.

6. Job Corps operates on a Program Year (PY) cycle, which begins on July 1 and ends on June 30 of the following year. Job Corps is currently in PY24, which began on July 1, 2024, and ends on June 30, 2025.

### **The Job Corps Transparency Report and Pause of Center Operations**

7. On April 25, 2025, DOL issued the news release, *US Department of Labor Releases New Job Corps Transparency Report*, a copy of which is attached hereto as Exhibit 1. This news release announced and linked to the *Job Corps Transparency Report 2025*, a copy of which is attached hereto as Exhibit 2.

8. On May 29, 2025, DOL announced that it was pausing the operation of the 99 contractor-operated Job Corps centers. DOL issued the news release, *US Department of Labor Pauses Job Corps Center Operations*, a copy of which is attached hereto as Exhibit 3. The news release attached and linked to a document entitled *Job Corps Pause FAQs*, a copy of which is attached hereto as Exhibit 4.

9. DOL has developed a resources page to assist students at centers whose operators' contracts have been terminated with transition to other education and training opportunities. DOL also instructed Job Corps center operators, as a part of an orderly shutdown of center operations, to ensure that all students are safely separated and transported to their home of record, to register each student with the American Job Center nearest to their home of record and with their home state's Labor Exchange system, and to attempt to obtain students' consent to

disclose information in their student file to assist with job placement, training, educational, and other supportive services. DOL's Employment and Training and Administration has also attempted to contact state workforce agencies to request that they identify and offer available programming and services to eligible Job Corps youth and/or center staff.

### **Prior Pauses of Center Operations**

10. DOL has paused Job Corps center operations in the past by ceasing contractor operations at the center—through termination of the contract, stop-work orders, or by letting the contract expire—before ultimately deciding to close the center through the statutorily prescribed notice-and-comment process.

11. In September 2015, DOL placed the Homestead Job Corps Center in Homestead, Florida, in inactive status following a violent crime near the campus. Students were given the option of transferring to other Job Corps centers or separating from the program. DOL awarded a caretaker contract (for facility maintenance, grounds maintenance, and security services) to a different contractor and terminated its contract with the contractor operating the center on November 15, 2015. On August 2, 2017, DOL proposed the permanent closure of the Homestead Job Corps Center by publishing a Notice in the *Federal Register* explaining the reasons for the proposed closure, including the unsafe center conditions that required millions of dollars in repairs. A copy of the *Federal Register* notice is attached hereto as Exhibit 5. DOL also notified the appropriate congressional committees and members of the proposed closure, as required by 29 U.S.C. § 3209(j). In April 2018, DOL decided to permanently close the center. A copy of the Decision Memorandum is attached hereto as Exhibit 6.

12. In September 2017, Hurricane Maria damaged the three Job Corps Centers in Puerto Rico—the Arecibo Job Corps Center in Arecibo, the Ramey Job Corps Center in

Aguadilla, and the Barranquitas Job Corps Center in Barranquitas—with the Barranquitas center suffering the most significant damage. All three centers, which were operated by the same operator, were placed in inactive status due to structural damage, and students were given the option of transferring to other Job Corps centers or separating from the program. On October 5, 2017, DOL issued a stop-work order notifying the operator to cease operations at all three centers. A copy of the order is attached to the Declaration of Jillian Matz. DOL ultimately determined that the best use of its funds was to consolidate operations in Puerto Rico to two centers (Arecibo and Ramey), conduct facility repairs and improvements on those two centers, and close the center in Barranquitas. The Ramey center reopened in May 2018 and the Arecibo center reopened in February 2020.

13. Also in September 2017, Hurricane Irma damaged the Gainesville Job Corps Center in Gainesville, Florida. It was placed in inactive status due to the significant costs associated with repairing the center, and students were given the option of transferring to other Job Corps centers or separating from the program. On October 6, 2017, DOL issued a stop-work order notifying the operator to cease operation of the center. A copy of the order is attached to the Declaration of Jillian Matz.

14. DOL proposed the closure of the Barranquitas and Gainesville Job Corps Centers in a January 2, 2019, notice in the *Federal Register*, and notified the appropriate congressional committees and members, after which the two centers were closed in September 2019. A copy of the *Federal Register* notice and Decision Memorandum are attached hereto as Exhibits 7 and 8.

15. In program year 2024, the Job Corps program operated at a \$140 million deficit, which necessitated identifying cost-saving measures to complete the program year. As a result, DOL reduced services at Job Corps centers by modifying center operations contracts and Job

Corps national office contracts to reduce or eliminate certain contract requirements. For example, program-wide support contracts for several services, including IT services, marketing and communications, and data collection/analysis were reduced. Center operations contracts were also reduced to realize cost savings by eliminating requirements for centers to provide oral health services, evening and weekend studies programming, and certain placement services to former enrollees. A copy of the Decision Memorandum explaining these actions is attached hereto as Exhibit 9. DOL also paused center operations at two centers as of January 31, 2025—the Whitney M. Young Job Corps Center in Simpsonville, Kentucky, in which DOL did not exercise a contract option year award after the base period of the contract ended, and the Woodstock Job Corps Center in Woodstock, Maryland, in which the contract expired but has been incrementally extended only to provide caretaker services for the facility. *See* Exhibit 9; a copy of the Whitney M. Young Option Year Decision Notice attached as Exhibit 10. Students at the Whitney M. Young and Woodstock centers were given the option of transferring to other Job Corps centers or separating from the program. DOL also paused the reestablishment of operations at the Carville Job Corps Center in Carville, Louisiana, following the end of a demonstration project by the Louisiana Department of Military Affairs, by terminating for convenience the contract of the new operator, which was in the ramping up period for reestablishing center operations. A copy of the termination for convenience is attached in declaration of Jillian Matz. At the time the contract was terminated there were no students at the Carville Job Corps center.

## **Cost of Operating the Job Corps Centers**

16. I spoke with ETA's Office of Financial Administration regarding the daily costs of center operations, and it estimated that it costs \$3 million per day to operate the 99 contractor-operated centers.

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In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Signed this 10th day of June of 2025.

**Erin McGee**

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Erin McGee  
Acting Administrator  
Office of Job Corps